

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STATE OF NEW YORK *ex rel.* TZAC, INC.

Plaintiff-Relator,

v.

NEW ISRAEL FUND,

Defendant.

No. 1:20-cv-2955-GHW

ORAL ARGUMENT REQUESTED

**NEW ISRAEL FUND'S
NOTICE OF MOTION TO DISMISS
THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of New Israel Fund's Motion to Dismiss the Amended Complaint, Defendant New Israel Fund, by and through its attorneys, will move this Court before the Honorable Gregory H. Woods, United States District Judge for the Southern District of New York, Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl St., New York, New York 10007, on such date as the Court will determine, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing with prejudice all claims against New Israel Fund in the Amended Complaint (Doc. 30) in the above-captioned action and granting such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the August 11, 2020 Order of this Court, opposing papers, if any, are due no later than September 15, 2020 and reply papers, if any, are due no later than seven days after service of the latest-filed opposing papers.

Dated: August 25, 2020

Respectfully submitted.

/s/ Jeffrey S. Bucholtz

Jeffrey S. Bucholtz, *Pro Hac Vice*
Gabriel Krimm, *Pro Hac Vice*
KING & SPALDING LLP
1700 Pennsylvania Ave., NW
Washington, DC 20006
Tel: 202-626-2907
Fax: 202-626-3737
jbucholtz@kslaw.com
gkrimm@kslaw.com

Brian Hauss
Arianna Demas
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
125 Broad St., 18th Floor
New York, NY 10004
Tel: (212) 549-2604
Fax: (212) 549-2649
bhauss@aclu.org
ademas@aclu.org

J. Emmett Murphy
KING & SPALDING LLP
1185 Avenue of the Americas
New York, NY 10036
Tel: (212) 556-2100
Fax: (212) 556-2222
jemurphy@kslaw.com

Counsel for Defendant New Israel Fund